

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

ANGELA RUSSELL, AS ADMINISTRATRIX
OF THE ESTATE OF JEREMY T. RUSSELL
AND ON BEHALF OF THE WRONGFUL DEATH
BENEFICIARIES OF JEREMY T. RUSSELL
Plaintiffs,

VERSUS CASE NO. 3:22-CV-294-HTW-LGI

MANAGEMENT & TRAINING CORPORATION;
MICHAEL MCCLINTON; MARCUS ROBINSON;
JACOB VIGILANTE; JOHN AND JANE DOE
CORRECTIONAL OFFICERS; VITALCORE
HEALTH STRATEGIES, LLC; EVELYN DUNN;
STACEY KITCHENS; WILLIAM BRAZIER; and
JOHN AND JANE DOE MEDICAL PROVIDERS
Defendants.

ZOOM VIDEOCONFERENCE 30(b)(6) DEPOSITION OF
MANAGEMENT & TRAINING CORPORATION
BY AND THROUGH ITS DESIGNATED REPRESENTATIVE,
WARDEN DONALD JACKSON

APPEARANCES NOTED HEREIN

DATE: JULY 7, 2023
TIME: 10:59 A.M.

REPORTED BY:

Laura Cross, CCR #1691
Court Reporter and Notary Public

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	ROBINSON; AND JACOB VIGLIANTE
	ALSO PRESENT:
	Dan Magee, Legal Video Technician

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1	THE VIDEOGRAPHER:
2	Good morning. This is the videotaped
3	deposition of Management & Training Corporation
4	taken by counsel in the matter of Angela Russell,
5	et al., vs. Management & Training Corporation, et
6	al. Today's date is July 7, 2023. The time now
7	is 10:58 a.m. Counsel may now introduce themselves
8	on record.
9	MR. BRAGG:
10	Grafton Bragg. I represent Angela
11	Russell and the wrongful death beneficiaries and
12	estate beneficiaries of Jeremy Russell.
13	MR. GARNER:
14	Jarrad Garner. I represent MTC and its
15	individually named employee defendants.
16	THE VIDEOGRAPHER:
17	The court reporter may now swear in --
18	excuse me.
19	MR. CHASE:
20	Michael Chase representing VitalCore,
21	Evelyn Dunn, Stacey Kitchens and William Brazier.
22	THE VIDEOGRAPHER:
23	The court reporter may now swear in the
24	witness.
25	WARDEN DONALD JACKSON

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1	having been first duly sworn, was
2	examined and testified as follows:
3	EXAMINATION
4	BY MR. BRAGG:
5	Q. All right. Please state your name for
6	the record.
7	A. Donald Ray Jackson, Sr.
8	Q. All right. Do you mind if I call you
9	Warden Jackson?
10	A. You can call me Warden or Donald,
11	either one, whichever you are comfortable with.
12	Q. Okay. Sounds good. My name is Grafton
13	Bragg. As I said before, I represent Angela
14	Russell who is the representative on behalf of the
15	wrongful death beneficiaries and estate
16	beneficiaries for Jeremy Russell. And I'm sure
17	that you are familiar with the litigation that
18	gives rise to this deposition.
19	A. Yes.
20	Q. Okay. Have you ever given testimony on
21	behalf of a company before?
22	A. Yes.
23	Q. Okay. So you've given a 30(b)(6)
24	deposition like we're here doing today?
25	A. Yes.

<p style="text-align: right;">Page 30</p> <p>1 We now have VitalCore. 2 Q. Okay. And before VitalCore it was 3 Centurion; is that correct? 4 A. Again, I'm not sure. I don't want to 5 say Centurion because I don't know who it was. 6 Q. All right. I want to show you another 7 document. 8 A. Okay. 9 MR. BRAGG: 10 Oh, sorry. Let's go off the record for 11 just a second. 12 THE VIDEOGRAPHER: 13 Off the record. The time now is 12:19 14 p.m. 15 (Off the record.) 16 THE VIDEOGRAPHER: 17 Back on the record. The time now is 18 12:20 p.m. 19 BY MR. BRAGG: 20 Q. All right. Warden Jackson, have you 21 reviewed the affirmative defenses that MTC filed 22 in this case to the complaint? 23 A. Yeah. I looked at it, yes. 24 Q. Okay. The 24th defense says -- and 25 I'll quote a portion of it -- that MTC would show</p>	<p style="text-align: right;">Page 32</p> <p>1 who has given an opinion about VitalCore's 2 responsibility? 3 MR. GARNER: 4 Our expert witness. 5 A. I think his name is Mr. Langford. 6 BY MR. BRAGG: 7 Q. Okay. And he is not a medical expert; 8 is that correct? 9 A. Right. 10 Q. So do I understand that MTC is taking 11 the position that this was a health care issue, 12 not a security issue that led to Jeremy Russell's 13 death? 14 MR. GARNER: 15 Object to the form of the question. 16 A. Right. It was a health care issue. It 17 wasn't our -- we don't make the decision if a 18 person's on suicide to take them off suicide. 19 That's all done through VitalCore. 20 BY MR. BRAGG: 21 Q. All right. Does Management Training 22 Corporation, not just at East Mississippi, but at 23 large, have a suicide prevention policy? 24 MR. GARNER: 25 Object to the form.</p>
<p style="text-align: right;">Page 31</p> <p>1 that the acts or omissions of others for whom it 2 has no responsibility or liability are the sole 3 proximate or contributing cause of plaintiff's 4 injuries and/or damages, if any, and that a jury 5 must be allowed to assess the proportionate share 6 of fault to those parties and/or participants. 7 And I want to ask you specifically about that 8 defense. Does MTC take the position that 9 VitalCore or any of VitalCore's employees is 10 responsible for the death of Jeremy Russell? 11 MR. GARNER: 12 Hold on, Warden Jackson. 13 THE WITNESS: 14 Yes, sir. 15 MR. GARNER: 16 I'm going to object to the form and 17 also object to the extent that calls for a legal 18 conclusion or requires expert testimony. But to 19 that extent he can answer if he knows. 20 BY MR. BRAGG: 21 Q. Okay. You may answer the question. 22 A. Okay. It is VitalCore, not MTC. And I 23 would refer to the expert witness on his written 24 review of the outcome of his report. 25 Q. And you're talking about Dr. Mark Webb</p>	<p style="text-align: right;">Page 33</p> <p>1 A. Yes. 2 BY MR. BRAGG: 3 Q. What sorts of facilities does that 4 policy apply to? 5 A. It's applied to all of the MTC 6 facilities. But with us, we actually go over the 7 one with MDOC, as well. 8 MR. BRAGG: 9 All right. I want to see if this 10 document will pull up. All right. Let's go off 11 the record. 12 THE VIDEOGRAPHER: 13 Off the record. The time now is 12:23 14 p.m. 15 (Off the record.) 16 THE VIDEOGRAPHER: 17 Back on the record. The time now is 18 12:27 p.m. 19 BY MR. BRAGG: 20 Q. All right. And so what is this 21 document? 22 A. East Mississippi Suicide Precaution, 23 Intervention and Management. 24 Q. And according to the top here it says 25 it was effective on October 22nd, 2014; is that</p>